

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and) Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)
) Honorable Aleta A. Trauger
 Plaintiff,)
) RESPONSE TO MARIE NEWBY'S
vs.) MOTION TO INTERVENE AND UNSEAL
CORRECTIONS CORPORATION OF) JUDICIAL DOCUMENTS AND EXHIBITS
AMERICA, et al.,)
)
 Defendants.)
)
)

Plaintiff respectfully submits this response to Marie Newby's Motion to Intervene and Unseal Judicial Documents and Exhibits. ECF No. 481.

Plaintiff takes no position on Ms. Newby's Motion.

DATED: March 2, 2022

ROBBINS GELLER RUDMAN & DOWD LLP
CHRISTOPHER M. WOOD, #032977
CHRISTOPHER H. LYONS, #034853

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

414 Union Street, Suite 900
Nashville, TN 37219
Telephone: 800/449-4900
615/252-3798 (fax)
cwood@rgrdlaw.com
clyons@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP
WILLOW E. RADCLIFFE
KENNETH J. BLACK
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
willowr@rgrdlaw.com
kennyb@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP
JASON A. FORGE
RACHEL L. JENSEN
NATALIE F. LAKOSIL
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
jforge@rgrdlaw.com
rjensen@rgrdlaw.com
nlakosil@rgrdlaw.com

Lead Counsel for Plaintiff

BARRETT JOHNSTON MARTIN
& GARRISON, LLC
JERRY E. MARTIN, #20193
Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219
Telephone: 615/244-2202
615/252-3798 (fax)

Local Counsel

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 2, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

ROBBINS GELLER RUDMAN
& DOWD LLP
414 Union Street, Suite 900
Nashville, TN 37219
Telephone: 615/244-2203
615/252-3798 (fax)
E-mail: cwood@rgrdlaw.com

Mailing Information for a Case 3:16-cv-02267 Grae v. Corrections Corporation of America et al**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Kenneth J. Black**
kennyb@rgrdlaw.com
- **Paul Kent Bramlett**
pknashlaw@aol.com
- **Robert P. Bramlett**
robert@bramlettlawoffices.com
- **Christopher T. Cain**
cain@scottandcain.com,ambrose@scottandcain.com
- **Patrick V. Dahlstrom**
pdahlstrom@pomlaw.com
- **Jason A. Forge**
jforge@rgrdlaw.com
- **Brian T. Glennon**
brian.glennon@lw.com
- **Michael Goldberg**
michael@goldberglawpc.com
- **Elizabeth O. Gonser**
egonser@rwjplc.com,nnguyen@rwjplc.com
- **Marc Gorrie**
mgorrie@pomlaw.com
- **Meryn C.N. Grant**
Meryn.Grant@lw.com
- **Dennis J. Herman**
dherman@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **James A. Holifield , Jr**
aholifield@holifieldlaw.com
- **J. Alexander Hood , II**
ahood@pomlaw.com
- **Rachel L. Jensen**
rachelj@rgrdlaw.com,e_file_sd@rgrdlaw.com,rachelj@ecf.courtdrive.com
- **Natalie F. Lakosil**
nlakosil@rgrdlaw.com,nlakosil@ecf.courtdrive.com,e_file_sd@rgrdlaw.com
- **Jeremy A. Lieberman**
jalieberman@pomlaw.com,disaacson@pomlaw.com,lpvega@pomlaw.com
- **Christopher Hamp Lyons**
clyons@rgrdlaw.com,KennyB@rgrdlaw.com,e_file_sd@rgrdlaw.com,clyons@ecf.courtdrive.com
- **Jerry E. Martin**
jmartin@barrettjohnston.com,jkarsten@barrettjohnston.com,ealexander@barrettjohnston.com,jmartin@rgrdlaw.com
- **Milton S. McGee , III**
tmcgee@rwjplc.com,dgibby@rwjplc.com
- **Faraz Mohammadi**
faraz.mohammadi@lw.com
- **Willow E. Radcliffe**
willowr@rgrdlaw.com,WillowR@ecf.courtdrive.com
- **Steven Allen Riley**
sriley@rwjplc.com,dgibby@rwjplc.com
- **Brian Schall**
brian@schallfirm.com
- **David J. Schindler**
david.schindler@lw.com
- **Wynn M. Shuford**
Wynn.Shuford@usdoj.gov,liz.lopes@usdoj.gov,melissa.russell@usdoj.gov

- **Ellen Gusikoff Stewart**
elleng@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Brice M. Timmons**
brice@donatilaw.com,craig@donatilaw.com,jacque@donatilaw.com
- **Sarah A. Tomkowiak**
sarah.tomkowiak@lw.com
- **Morgan E. Whitworth**
morgan.whitworth@lw.com,morgan-whitworth-8044@ecf.pacerpro.com
- **Christopher M. Wood**
cwood@rgrdlaw.com,agonzales@rgrdlaw.com,willowr@rgrdlaw.com,agonzales@ecf.courtdrive.com,CWood@ecf.courtdrive.com,morgank@ecf.courtdrive.com,smc

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)